

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|-----------------------------------|---|-------------------------------|
| RENEE ZINSKY, |) | Civil Action No.: 2:22-cv-547 |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Electronically Filed |
| |) | |
| MICHAEL RUSSIN, RUSSIN |) | |
| FINANCIAL, RUSSIN GROUP, |) | |
| SIMON ARIAS, III, ARIAS AGENCIES, |) | |
| S.A. ARIAS HOLDINGS, LLC, |) | |
| AMERICAN INCOME LIFE |) | |
| INSURANCE COMPANY, |) | |
| |) | |
| Defendants. | | |

AMENDED MOTION TO STAY PROCEEDINGS

AND NOW, comes Defendant, Michael Russin, by and through his attorneys Benjamin D. Webb, Esquire and Cozza Law Group PLLC, and files the within Amended Motion to Stay the Proceedings, averring as follows:

1. Defendant, Michael Russin, and Plaintiff entered into mediation with David White of Burns White. Separately, Plaintiff entered into another mediation with Attorney White, with co-defendants, Simon Arias, American Income Life Insurance Company, et al. Due to ongoing settlement discussions, the parties would like additional time to work out the details of the settlement negotiations.

2. The deadline for parties to file dispositive motions in this case is November 22, 2023.

3. For the aforementioned reasons, the undersigned counsel requests that the instant proceedings be stayed for a period of 60 days.

4. Counsel for Plaintiff, Renee Zinsky, has stipulated to this Motion.

WHEREFORE, Defendant, Michael Russin, respectfully requests that this Honorable Court enter the Order attached hereto, granting Defendant's Amended Motion to Stay the Proceedings.

Dated: October 26, 2023

Respectfully submitted

Cozza Law Group PLLC

Savinis, Kane & Gallucci, LLC

s/Benjamin D. Webb

Benjamin D. Webb, Esquire
PA I.D. No. 328170
400 Holiday Drive, Suite 210
Pittsburgh, Pennsylvania 15220
(412) 294-8444
bwebb@cozzalaw.com
Counsel for Defendant Russin

s/Janice Savinis

Janice M. Savinis, Esquire
PA I.D. No. 51943
436 Seventh Avenue #700
Pittsburgh, Pennsylvania 15219
(412) 567-4931
jsavinis@sdklaw.com
Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing Motion to Stay has been sent via the CM/ECF system to all counsel and/or parties of record.

Cozza Law Group PLLC

/s/Benjamin D. Webb

Benjamin D. Webb, Esquire